



## Paducah Citizens Advisory Board

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## **Recommendation No 15-05: Community Guiding Principles for Prioritization Rev. 6**

Draft July 27, 2015

### **Background**

The Paducah Gaseous Diffusion Plant (PGDP) site is at a momentous juncture in its history. For many years the plant was operated by Union Carbide Corporation and its successors. In 1998 the United States Enrichment Corporation (USEC) took responsibility for the operations of the gaseous diffusion plant through the Privatization Act. Under the lease terms of the agreement, the Department of Energy retained ownership of the site while USEC leased the buildings associated with gaseous diffusion, along with support buildings. Those buildings for which USEC had no need were retained by the DOE.

Understandably, while USEC operated the plant, only a limited amount of remediation and decontamination and decommissioning (D&D) could be planned and executed. In a tri-party agreement, regulatory agencies made decisions on cleanup of the site based upon the options available under operating conditions. USEC ceased enrichment operations and formally returned the PGDP to the DOE in October 2014. The opportunity now exists to look at the site as a whole and plan remediation accordingly.

It seems logical for all parties to formulate a new agreement based upon a holistic approach to the site. Re-sequencing the current cleanup strategy for the PGDP could result in better planning and execution of cleanup work for the entire site and should result in the lowest overall lifecycle costs to the DOE and the taxpayers. Additionally, it will support the community in optimizing future use of the site and achieving a mutually beneficial end state.

### **Recommendation**

The CAB requests that the DOE and regulators consider the following community values during any future tri-party discussions in formulating a new agreement or setting milestones and use these values as guiding principles for community input into the decision making process, in the following order of priority:

1. Plan and request funding to support active D&D and demolition.
2. Maintaining project continuity and providing a safe, stable and trained workforce to support D&D and remediation activities is one of the community's primary concerns. DOE should sequence activities that support a minimum funding level of \$324M (FY 2014).
3. Continue to develop a culture of open dialogue between all stakeholders and all regulators. Open discussions concerning critical topics including cleanup priorities, budget scenarios, land transfers and asset revitalization are essential to visible successes and mission completion.

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4. Maximize recycling and asset transfer. The CAB supports volume reduction, reuse, and recycling of all materials including valuable onsite materials and metals.
5. In consideration of the community's desire for viable reuse of the DOE site and adjacent property, the aesthetics of the site and remaining facilities are important to the community. The site should remain in presentable shape for public tours, prospective businesses, employees and plant neighbors. Natural screening barriers should be considered for long term projects, i.e. an onsite waste disposition facility.
6. Waste Disposal Options should assume utilization of both the U-Landfill and a new on-site CERCLA cell waste disposal facility. Recognizing that fill dirt will be needed for the on-site waste disposal cell, sequence soils and burial grounds work to maximum benefit, thereby remediating hazards, properly disposing of hazards, and obtaining fill dirt simultaneously. The large amount of fill dirt that will be required for the waste disposal cell offers an excellent opportunity for enhancement of attractive and beneficial wildlife and recreation areas on sites adjacent to the limited area of the PGDP.
7. Ultimately, it is the mission of the project to minimize the site's legacy environmental impact. The community prefers the DOE leave as little of a legacy waste footprint as possible. The CAB encourages DOE to plan and request funding for remediation efforts to reduce its footprint both inside and outside the fence as soon as possible.